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10 *Attorneys for Plaintiffs*

11 **IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 SELINA KEENE, MELODY FOUNTILA, MARK) Case No.: 4:22-cv-01587-JSW
14 MCCLURE,)
14 Plaintiffs,)
15)
15 v.)
16)
16 CITY AND COUNTY OF SAN FRANCISCO;)
17 LONDON BREED, Mayor of San Francisco in her) Date: July 8, 2022
18 official capacity; CAROL ISEN Human Resources) Time: 9:00 AM
19 Director, City and County of San Francisco, in her) Courtroom: 5
19 official capacity; DOES 1-100,)
20)
20 Defendants.)
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[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

1 For good cause shown, the Court grants Plaintiffs' Motion for Preliminary Injunction.
2 Plaintiffs have demonstrated irreparable harm as a result of Defendant CCSF's COVID-19 vaccine
3 mandate, and there is minimal or no cost to Defendants to accommodate them. Additionally,
4 Plaintiffs have shown that the vaccine mandate, as applied to them, is irrational. Plaintiffs have
5 more robust immunity than can be provided by any vaccine and are COVID-19 negative. A
6 COVID-19 negative person cannot transmit a disease they do not have, and given that Plaintiffs
7 are COVID-19 negative, it makes no sense to not allow them to continue working at CCSF. For
8 good cause shown, the Court orders as follows:

9 That CCSF accommodate Plaintiffs by rehiring them, with back pay, and allowing them to
10 telecommute to work or mandating that Plaintiffs wear PPE at all times while working for CCSF
11 and to test for COVID-19 at least twice per week (or every day if deemed necessary by CCSF).

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Dated: _____

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JUDGE JEFFREY S. WHITE
U.S. SENIOR DISTRICT JUDGE

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